

September 19, 2011

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92;
High-Cost Universal Service Support, WC Docket No. 05-337; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Connect America Fund*, WC Docket No. 10-90; *A National Broadband Plan for Our Future*, GN Docket No. 09-51

Dear Ms. Dortch:

On September 15, 2011, Megan Delany and Christopher Nierman of General Communications, Inc. ("GCI"), and I, also on behalf of GCI, met with Angela Kronenburg, Wireline Legal Advisor to FCC Commissioner Mignon Clyburn. We then met with Christine Kurth, Policy Director and Wireline Counsel for FCC Commissioner Robert McDowell. Finally we met with Margaret McCarthy, Wireline Policy Advisor to Commissioner Michael Copps.

In each of the meetings, we reviewed GCI's Alaska Broadband Plan, attached as Appendix 1 to GCI's Comments in response to the Public Notice,¹ as clarified by GCI's Reply Comments to the Public Notice at 7.² We described GCI's ABP as set forth therein. We noted that there are many similarities between the plans filed by Alaska carriers, including the Target Alaska Fund proposed by ACS, as well as the proposals of the Alaska Rural Coalition. These proposals vary principally with respect to the amount of revenue protection afforded to ILECs if consumers move overwhelming to wireless, as well as the specifics of broadband services that would be required for an ETC to provide under the plan. We also discussed that GCI's plan assumes the existence of the restructure mechanisms of the ABC and RLEC plans, separate from the USF reforms set forth in the ABP, and the other Alaska plans generally similarly assume a separate restructure mechanism.

¹ *Further Inquiry into Certain Issues in the Universal Service – Intercarrier Compensation Transformation Proceeding*, Public Notice, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51 (rel. Aug. 3, 2011), Comments of General Communication Inc. (filed August 24, 2011).

² Reply Comments of General Communication, Inc., WC Docket No. 10-90 et al. (filed Sept. 6, 2011).

A copy of this letter is being filed in the above-referenced dockets.

Sincerely,

A handwritten signature in blue ink, appearing to read "John T. Nakahata".

John T. Nakahata
Counsel to General Communication Inc.

cc: Angela Kronenburg
Christine Kurth
Margaret McCarthy
Megan Delany
Christopher Nierman